

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

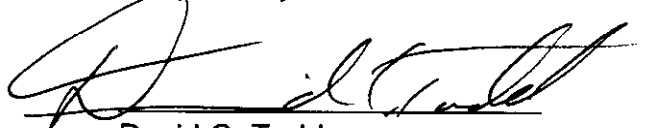
POSTAL RATE AND FEE CHANGES, 2000

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**FIRST SET OF INTERROGATORIES OF MAIL  
ORDER ASSOCIATION OF AMERICA TO VAL-PAK/  
CAROL WRIGHT WITNESS HALDI (MOAA/VP-CW-T1-1-5)**

Pursuant to Sections 25 and 26 of the rules of practice, the Mail Order Association of America (MOAA), submits the following interrogatories to VP/CW witness Haldi (VP/CW-T1-1-5)

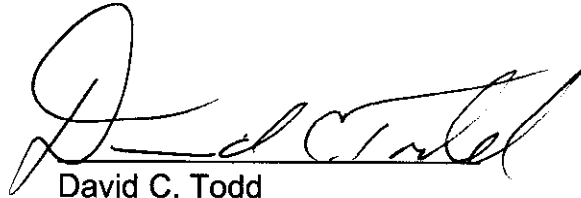
Respectfully submitted,



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Counsel for Mail Order Association of America

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the forgoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

  
David C. Todd

Date: June 18, 2000

**INTERROGATORIES OF MAIL ORDER ASSOCIATION OF  
AMERICA TO VAL-PAK/CAROL WRIGHT WITNESS HALDI**

MOAA/VP/CW-T1-1: Please confirm the following Standard A Enhanced Carrier Route Pound Rates:

- a). The USPS proposed pound rate for no destination entry of \$0.584 in R2000-1;
- b). Your proposed pound rate for no destination entry of \$0.661 in R2000-1;
- c). The USPS proposed pound rate for no destination entry of \$0.53 in R97-7;
- d). Your proposed pound rate for no destination entry of \$0.53 in R97-1.

MOAA/VP/CW-T1-2: Please explain all reasons for not adopting the USPS' proposal in R2000-1 for the pound rate for Standard Mail A ECR, a rate that is higher than the pound rate you proposed in R97-1.

MOAA/VP-CW-T1-3: In your "Appendix B. The Relationship between Cost and Weight within Standard A Mail" at B-3 (lines 10-13), you critique USPS witness Daniel's weight-cost study for not using USPS witness Crum's results destination entry cost savings.

- a). Did you make any effort to use witness Crum's results to modify and/or restate witness Daniel's weight-cost relationship?
- b). If the answer to a) is yes, please provide your analysis and results.
- c). If the answer to a) is no, please explain how you believe witness Crum's results should be integrated into witness Daniel's costs study.

MOAA/VP-CW-T1-4: In your "Appendix B. The Relationship between Cost and Weight within Standard A Mail" at B-4 (lines. 14-19):

- a). Does your "observation" imply that witness Daniel has double counted dock handling costs in her weight-cost study?
- b). If your answer to part a) is yes, please confirm that this alleged double count will result in estimated unit costs that are biased higher than the actual unit costs? (If you cannot confirm, please explain the logic for your answer.)

- c). If your answer to part a) is no, please explain what you mean and identify "the study" (at line 17) to which you refer.

MOAA/VP-CW-T1-5: In your "Appendix B The Relationship between Cost and Weight within Standard A Mail", you state that "For Standard A ECR Mail, 71.5 percent of all mail processing tallies were for mixed mail " at B-14. Please provide the calculation of this result from the data provided in response to VP-CW/USPS-T28-24, referenced in your footnote (52).